

## MARINO, TORTORELLA &amp; BOYLE, P.C.

KEVIN H. MARINO  
JOHN D. TORTORELLA  
JOHN A. BOYLE

ROSEANN BASSLER DAL PRA\*  
EREZ J. DAVY\*  
ANTHONY J. TAGLIAFERRO  
MICHAEL J. FLYNN

ATTORNEYS AT LAW  
437 SOUTHERN BOULEVARD  
CHATHAM, NEW JERSEY 07928-1488  
TELEPHONE (973) 824-9300  
FAX (973) 824-8425  
www.khmarino.com

875 THIRD AVENUE, 21ST FLOOR  
NEW YORK, NEW YORK 10022  
TELEPHONE (212) 307-3700  
FAX (212) 542-3790  
e-mail: jtortorella@khmarino.com  
\*OF COUNSEL

January 29, 2025

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State St.  
Trenton, NJ 08608

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080 | Deadline for Responses to ECF Nos. 397, 398, and 399

Dear Judge Singh:

Pursuant to CMO #17 [ECF 386], Defendants Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC (collectively, "CVS Caremark"); Express Scripts, Inc., Medco Health Solutions, Inc., and Express Scripts Administrators, LLC (collectively, "Express Scripts"); and OptumRx, Inc. (collectively, the "PBM Defendants") each intend to respond to the Letters Regarding Current Discovery Disputes Involving PBM Defendants [ECF 397], Current Discovery Disputes Involving Express Scripts [ECF 398], and Current Discovery Disputes Involving Optum [ECF 399] that Plaintiffs filed on January 28, 2025, as applicable.

The PBM Defendants each propose to respond separately to Plaintiffs' letters on or before Wednesday, February 5, 2025. If that date is acceptable, we respectfully request that you indicate the Court's approval by so ordering this letter.

Thank you for your consideration of this request and your continuing attention to this matter.

Respectfully submitted,

/s/ John D. Tortorella

John D. Tortorella

Counsel for Defendants Caremark Rx, LLC,  
Caremark LLC, and Caremark PCS Health,  
LLC

/s/ Jason R. Scherr

Jason R. Scherr

*Counsel for Defendants Express Scripts, Inc.,  
Medco Health Solutions, Inc., and Express  
Scripts Administrators, LLC*

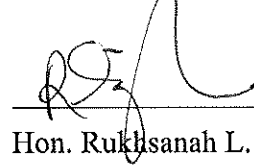
/s/ Thomas P. Scrivo

Thomas P. Scrivo

*Counsel for Defendant OptumRx, Inc.*

cc: Honorable Brian R. Martinotti, U.S.D.J.  
All counsel of record

SO ORDERED:



Hon. Rukhsanah L. Singh, U.S.M.J.

*January 30, 2025*